

15  
**Steelcote**

CO  
CORPORATE HAZARDOUS WASTE COATING

STEELCOTE MANUFACTURING COMPANY  
3412 CANTON, ST. LOUIS, MISSOURI 63103-1100  
(314) 771-9053

October 18, 1989

Mr. Mike Struckhoff, Chief  
Hazardous Waste Management  
State of Missouri  
Department of Natural Resources  
St. Louis Regional Office  
8460 Watson Road, Suite 217  
St. Louis, MO 63119

RECEIVED

OCT 26 1989

WASTE MANAGEMENT PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES

Dear Mr. Struckhoff:

Enclosed is Steelcote's response to your letter of September 22, outlining recommendations that Steelcote should make to come into full compliance. The four areas which are in question are as follows:

1. Notification of Land Disposal Restrictions. A note to our Hazardous Waste Disposal File has been added to make sure that the proper list of treatment standards are included in all waste shipments. However, Steelcote feels that according to 40 CFR 268.7 Section (a) (1) that a written waste analysis is not necessary. However, we are currently having our waste stream reanalyzed and will provide this information if the Missouri Department of Natural Resources deems it necessary.
2. Contingency Plan. On November 1, 1988, I personally mailed an updated copy of our contingency plan to Mr. Dean Martin, in Jefferson City. A copy of this letter is enclosed. You will see one addition to the letter to Mr. Dean Martin. In the section where we are discussing the coordination agreement with Barnes/Sutter Health Center, I have included the name of the individual with whom I have discussed this agreement.
3. Storage Over Ninety (90) Days. Enclosed also is a copy of the manifest that we used to ship to the PCB waste which is discussed in your report. I found out that our current hazardous waste disposer was able to dispose of the waste because it fell below their restrictions for PCB waste.

RCRA



564577

4. Waste Analysis. Enclosed, please find manifest showing the return of three drums of waste material contaminated with PCB's. Also enclosed is a waste analysis from the lab. These PCB's were disposed of recently by our present hazardous waste disposer, who is able to handle this particular type of waste. What Mr. Bennett seems to be referring to in stating that paint waste is being disposed of through sanitary trash is merely a residue left on quart and pint cans which we use to hold our coating products while they are being tested. The residue is just what is left clinging to the walls of the container after emptying the container into the batch. In discussing the testing of our coatings, my comment that our coatings are tested on a variety of parameters referred to finished product, not to the residual amount left in cans that have been thoroughly emptied. These tests involve physical parameters such as viscosity, weight per gallon, and dry times.

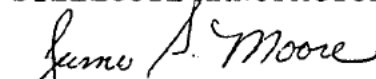
I would like to clarify some additional points made during the inspection of Steelcote. In discussing the contents of our two U.S.T.'s, I told Mr. Bennett that the material was unusable in its present form and had to be distilled before use. However, one tank held tung oil which was contaminated with water. This material will not be sold to any other user. The wash solvent in the other tank has been distilled.

In reference to the drums located in our hazardous waste storage area, I said that the drums Ms. Smith saw on her first visit were distilled, not shipped for disposal. The still bottoms generated were not yet shipped.

Mr. Struckhoff, I hope that this answers all of your questions. If you need any further explanation or have any further questions, please do not hesitate to call me at 771-8053.

Sincerely,

STEELCOTE MANUFACTURING COMPANY

  
James S. Moore  
Plant Manager

JSM:llw

Enclosures

cc: Ms. Sandra Carroll  
Chief, Hazardous Waste Enforcement  
Waste Management Program  
P.O. Box 176  
Jefferson City, MO 65102

D.A. Niedt  
Missouri DNR File

RECEIVED OCT 22 1988

## BOWSER-MORNER, INC.

CORPORATE: 420 Davis Ave. • P. O. Box 51 • Dayton, Ohio 45401 • 513/253-8805

## LABORATORY REPORT

Report To: Reclaimed Energy Company  
Attn: Tony Mode  
1500 Western Avenue  
Connersville, IN 47331

Date: October 27, 1988  
Laboratory No.: 8810192  
Chem Lab No: 03692

Report On: One (1) Liquid Sample Received October 13, 1988 for PCB Analysis.

## SAMPLE INFORMATION:

Steelcote PRM, 9-22-88

## TEST METHODS:

EPA SW-846 Test Methods for Evaluating Solid Waste.

## TEST RESULTS:

PCB

26 mg/Kg-Arochlor 1254  
7 mg/Kg-Arochlor 1242

Respectfully Submitted,  
BOWSER-MORNER, INC.

*Mark A. Bingman*  
Mark A. Bingman, Manager  
Technical Services  
Analytical Sciences Division

MAB/pj  
1-Client  
2-File

All samples recovered for this project will be retained at this laboratory for a period of 30 days unless we are informed to the contrary.

SIGNATURE INFORMATION MUST BE LEGIBLE ON ALL



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT  
P.O. Box 7035  
Indianapolis, IN 46207-7035

442-K  
443-K 9-22

PLEASE PRINT OR TYPE

(Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS  
WASTE MANIFEST

1. Generator's US EPA ID No.

M-O-D-O-0-6-2-7-5-0-3-6

Manifest Document No.

0-0-0-1-4

2. Page 1

1 of 1

Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

3. Generator's Name and Mailing Address

Steelcote Manufacturing  
3418 Gratiot  
St. Louis, MO. 63103

A. State Manifest Document Number

INA 0239265

4. Generator's Phone ( 314 )

771-8053

B. State Generator's ID

001157

5. Transporter 1 Company Name

Superior Solvents &amp; Chemicals, Inc.

6. Use EPA ID Number

M-O-D-O-7-9-9-1-0-6-0-0

C. State Transporter's ID

H-1115

7. Transporter 2 Company Name

8. Use EPA ID Number

D. Transporter's Phone

314-621-2600

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

Reclaimed Energy Co. Inc.  
1500 Western Ave.,  
Connersville, IN. 47331

10. Use EPA ID Number

I-N-D-O-0-0-7-8-0-4-0-1

G. State Facility's ID

H. Facility's Phone

317-827-0772

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

No.

Type

13. Total Quantity

14. Unit Wt/Vol.

Waste No.

a. Waste Paint Related Material  
Flammable Liquid UN1263 - Heavy

0.0.1 D.M

0.0.055

G

F003

b. Waste Paint Related Material  
Flammable Liquid UN1263 - Light

0.0.1 D.M

0.0.055

G

F003

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

Keep away from heat, sparks, and open flames. Excessive inhaling of vapors may be harmful. Prolonged contact with skin may be harmful.  
If not deliverable, return to generator in 10 days. InD#1056; Mo#H-1115

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

JAMES S. MOORE

James S. Moore

Month Day Year  
09 20 88

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

JAMES FITZGERALD

James Fitzgerald

Month Day Year  
09 20 88

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year  
09 20 88

19. Discrepancy Indication Space DRUMS BEING REJECTED AND RETURNED TO GENERATOR DUE TO MATERIAL BEING OFF SPECIFICATION. GENERATOR NOTIFIED.

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.

Printed/Typed Name

Signature

GENERATOR

TRANSPORTER

FACILITY

INA 0239265

Environmental Response at 317/243-5155 (day), or 317/633-0144 (night) and the  
National Response Center at 800/424-8802 or 202/426-2675.

4/11/32

## MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Waste Management Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

RCR 7-4991

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1-800-424-8802  
CHEM TREC  
1-800-424-9300  
DEPT. OF NATURAL RESOURCES  
314-634-2436

INSTRUCTIONS FOR THE COM-  
PLETION OF THIS FORM ARE ON A  
SEPARATE SHEET.

THIS DOCUMENT MUST BE USED  
FOR ALL MISSOURI-DESTINED  
SHIPMENTS.

## HAZARDOUS WASTE MANIFEST

Print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039, Expires 9-30-91

|   |  |   |  |                             |  |   |  |   |  |                  |  |                              |  |
|---|--|---|--|-----------------------------|--|---|--|---|--|------------------|--|------------------------------|--|
| <b>UNIFORM HAZARDOUS WASTE MANIFEST</b>   |  | 1. Generator's US EPA ID No.<br>M O D 0 0 6 2 7 5 0 3 6 1 2 0 0 1 8 |  | Manifest Document No.<br>1  |  | 2. Page 1 of 1  |  | Information in the shaded areas is required by State law. |  |                  |  |                              |  |
| 3. Generator's Name and Mailing Address<br>Steelcote Manufacturing Company<br>3418 Gratiot Street - St. Louis, MO 63103   |  |   |  |                             |  | A. Missouri Manifest Document Number<br>0 0 1 1 5 7 0 0 1 8 |  |   |  |                  |  |                              |  |
| 4. Generator's Phone ( 314 ) 771-8053 Jim Moore   |  |   |  |                             |  | B. State Generator's ID - other<br>0 0 1 1 5 7              |  |   |  |                  |  |                              |  |
| 5. Transporter 1 Company Name<br>Earth Industrial Waste Management  |  |   |  |                             |  | C. MO. Transporter's ID<br>H-1128                           |  |   |  |                  |  |                              |  |
| 6. US EPA ID Number<br>T N D 0 0 0 6 1 4 3 2 1  |  |   |  |                             |  | D. Transporter's Phone<br>901-358-5695                      |  |   |  |                  |  |                              |  |
| 7. Transporter 2 Company Name<br>None   |  |   |  |                             |  | E. MO. Transporter's ID                                     |  |   |  |                  |  |                              |  |
| 8. US EPA ID Number   |  |   |  |                             |  | F. Transporter's Phone                                      |  |   |  |                  |  |                              |  |
| 9. Designated Facility Name and Site Address<br>Earth Industrial Waste Management, Inc.<br>3536 Fite Road<br>Millington, TN 38053   |  |   |  |                             |  | G. State Facility's ID                                      |  |   |  |                  |  |                              |  |
| 10. US EPA ID Number<br>T N D 0 0 0 6 1 4 3 2 1   |  |   |  |                             |  | H. Facility's Phone<br>901-358-5695                         |  |   |  |                  |  |                              |  |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)  |  |   |  |                             |  | 12. Containers  |  | 13. Total Quantity  |  | 14. Unit Wt/Vol. |  | I. Waste No.                 |  |
| a. Waste, Flammable Liquid, n.o.s., UN1993  |  |   |  |                             |  | 8 D M   |  | 400   |  | G                |  | EPA WASTE CODE<br>F003, F005 |  |
| b.  |  |   |  |                             |  |   |  |   |  |                  |  | EPA WASTE CODE               |  |
| c.  |  |   |  |                             |  |   |  |   |  |                  |  | EPA WASTE CODE               |  |
| d.  |  |   |  |                             |  |   |  |   |  |                  |  | EPA WASTE CODE               |  |
| J. Additional Descriptions for Materials Listed Above   |  |   |  |                             |  | K. Handling Codes for Wastes Listed Above                   |  |   |  |                  |  |                              |  |
| a. 1022-001 Paint Sludge  |  |   |  |                             |  |   |  |   |  |                  |  |                              |  |
| b.  |  |   |  |                             |  |   |  |   |  |                  |  |                              |  |
| c.  |  |   |  |                             |  |   |  |   |  |                  |  |                              |  |
| d.  |  |   |  |                             |  |   |  |   |  |                  |  |                              |  |
| 15. Special Handling Instructions and Additional Information<br>EMERGENCY PHONE NO. 901-358-5695.<br>In case of fire use carbon dioxide, dry chemical or foam. In case of spill, eliminate sources of ignition, dam up to prevent run-off and repackage contaminated material in DOT approved containers. NO SMOKING!! ALTERNATE FACILITY: RETURN TO GENERATOR.   |  |   |  |                             |  |   |  |   |  |                  |  |                              |  |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.<br>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford. |  |   |  |                             |  |   |  |   |  |                  |  |                              |  |
| Printed/Typed Name<br>JAMES S. MOORE  |  |   |  | Signature<br>James S. Moore |  | Month<br>04   |  | Day<br>10   |  | Year<br>1989     |  |                              |  |
| 17. Transporter 1 Acknowledgement of Receipt of Materials   |  |   |  | Signature<br>Gary Palmer    |  | Month<br>04   |  | Day<br>10   |  | Year<br>1989     |  |                              |  |
| Printed/Typed Name<br>GARY PALMER   |  |   |  | Signature<br>Gary Palmer    |  | Month<br>04   |  | Day<br>10   |  | Year<br>1989     |  |                              |  |
| 18. Transporter 2 Acknowledgement of Receipt of Materials   |  |   |  | Signature                   |  | Month   |  | Day   |  | Year             |  |                              |  |
| Printed/Typed Name  |  |   |  | Signature                   |  | Month   |  | Day   |  | Year             |  |                              |  |
| 19. Discrepancy Indication Space<br>1 drum shipped as item 12A was rejected for being off-specification. AS   |  |   |  |                             |  |   |  |   |  |                  |  |                              |  |
| 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.  |  |   |  |                             |  |   |  |   |  |                  |  |                              |  |
| Printed/Typed Name<br>DORRIS GILBERT  |  |   |  | Signature<br>Dorris Gilbert |  | Month<br>10   |  | Day<br>41   |  | Year<br>2189     |  |                              |  |
| Signature   |  |   |  | Signature                   |  | Month   |  | Day   |  | Year             |  |                              |  |

MISSOURI DNR FINAL COPY - PART 1

THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED FACILITY THEN TRANSMITTED TO THE DEPARTMENT BY THE GENERATOR.

INSTRUCTIONS FOR THE COM-  
PLETION OF THIS FORM ARE ON A  
SEPARATE SHEET.  
THIS DOCUMENT MUST BE USED  
FOR ALL MISSOURI-DESTINED  
SHIPMENTS.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality  
Waste Management Program  
P.O. Box 176 Jefferson City, Missouri 65102  
314-751-3176

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1-800-424-8802  
CHEM TREC  
1-800-424-8800  
DEPT. OF NATURAL RESOURCES  
314-634-2438

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039, Expires 9-30-91

| UNIFORM HAZARDOUS WASTE MANIFEST  |  | 1. Generator's US EPA ID No.<br>MO D 0 0 6 2 7 5 0 3 6 | Manifest Document No.<br>00 0 20 | 2. Page 1 of 1  | Information in the shaded areas is required by State law. |
|---|--|--|----------------------------------|---|---|
| 3. Generator's Name and Mailing Address<br>Steelcote Manufacturing Company<br>3418 Gratiot<br>St. Louis, MO 63103   |  | 4. Generator's Phone ( 314 ) 771-8053                  |                                  | A. Missouri Manifest Document Number<br>000 0 1 1 3 7 0 0 2 0 |   |
| 5. Transporter 1 Company Name<br>CTC Industrial Services  |  | 6. US EPA ID Number<br>T N D 9 8 1 9 2 2 6 4 4         |                                  | B. State Generator ID Number<br>000 0 7                       |   |
| 7. Transporter 2 Company Name   |  | 8. US EPA ID Number                                    |                                  | C. MO Transporter ID<br>000 0 0                               |   |
| 9. Designated Facility Name and Site Address<br>American Resource Recovery Corp.<br>901 E. Bodley<br>Memphis, TN 38106  |  | 10. US EPA ID Number<br>T N D 9 9 1 2 7 9 4 8 0        |                                  | D. MO Transporter ID<br>000 0 0                               |   |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)  |  | 12. Containers   |                                  | 13. Total Quantity  | 14. Unit Wt/Vol.  |
| a. "RQ" Waste Paint Related Material, Flammable Liquid<br>UN1263 (E.P.A.-Ignitability-F003/F005) "RQ" 100 LBS.  |  | 15. 15 DM  |                                  | 16. 125 G   | EPA WASTE CODE<br>F003/F005                               |
| b.  |  |  |                                  |   | EPA WASTE CODE  |
| c.  |  |  |                                  |   | EPA WASTE CODE  |
| d.  |  |  |                                  |   | EPA WASTE CODE  |
| J. Additional Descriptions for Materials Listed Above   |  | K. Handling Codes for Wastes Listed Above              |                                  |   |   |
| a. CONTAINS PCB'S AT LESS THAN 50 PPM   |  |  |                                  |   |   |
| b.  |  |  |                                  |   |   |
| c.  |  |  |                                  |   |   |
| d.  |  |  |                                  |   |   |
| 15. Special Handling Instructions and Additional Information<br>If undeliverable return to generator. In event of spill, fire or other emergency it may be necessary to contact N.R.C. 1-800-424-8802.  |  |  |                                  |   |   |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.<br>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford. |  |  |                                  |   |   |
| Printed/Typed Name<br>JAMES S. MOORE  |  | Signature<br>James S. Moore                            |                                  | Month Day Year<br>1 0 1 1 8 9                                 |   |
| 17. Transporter 1 Acknowledgement of Receipt of Materials   |  | Printed/Typed Name<br>WILL WINDS                       |                                  | Signature<br>Will Winds                                       |   |
| 18. Transporter 2 Acknowledgement of Receipt of Materials   |  | Printed/Typed Name                                     |                                  | Signature   |   |
| 19. Discrepancy Indication Space  |  |  |                                  |   |   |
| 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.  |  |  |                                  |   |   |
| Printed/Typed Name  |  | Signature  |                                  | Month Day Year  |   |

GENERATOR COPY - PART 6

IMPORTANT

SEE INSTRUCTIONS SHOULD PART 1 & 2 FAIL TO RETURN WITHIN 35 DAYS.





CORROSION RESISTANT COATINGS

STEELCOTE MANUFACTURING COMPANY

3418 GRATIOT, ST. LOUIS, MISSOURI 63103-2990

(314) 771-8053

FAX (314) 771-7581

CONTINGENCY PLAN

1. GENERAL INFORMATION

Name: Steelcote Manufacturing Company  
Location: 3418 Gratiot Street, St. Louis, MO 63103  
Phone: (314) 771-8053  
Operator: Douglas A. Niedt, President

Ex. 6 PII

Emergency Coordinators:

James S. Moore, Plant Manager

Ex. 6 PII

Richard R. Ravens

Ex. 6 PII

Type of Facility: Coatings and Paint Manufacturing Plant

Facility Site Plan: See attached

Description of Activities: Coatings and Paint manufacturing.  
Equipment cleaned with solvent wash.

Emergency Equipment:

- a) Each floor has the required number of fire extinguishers.
- b) Each manufacturing floor has an emergency water hose for fire.
- c) Entire plant and warehouse has Sprinkler System.
- d) First Aid and eye wash available in laboratory.
- e) Emergency Numbers are covered by 911.
- f) Copy of Contingency Plan in office (Douglas A. Niedt), in production office, and in R&D laboratory.

2. FIRE, SPILLAGE, DRUM RUPTURE

In case of fire, spillage, or drum rupture, these Emergency Response Procedures will go into effect:

Fire: (See specific instructions below)  
Fire Department will be called by dialing 911.

Factory will cur operations and evacuate building.

### Procedures to Follow in Case of Fire

- 1) The person who spots the fire is to notify both plant and warehouse by holding down the yellow "SPCL" button on the telephone and announcing that there is a fire and also the floor number. He is to do this by going to the nearest, safest phone.
- 2) Everyone-upon hearing the fire announcement-is to evacuate the building immediately.

If the fire is above you -- TAKE THE STAIRS!

If the fire is below you -- TAKE THE FIRE ESCAPE!

DO NOT -- DO NOT -- WAIT FOR THE ELEVATOR!

Stairwell doors should be kept closed at all times.

It is suggested that if the fire is below your floor, you use the fire escape since the stairwell may become smoke filled.

If the fire is above you, the choice of either the stairwell or fire escape would depend upon which you are closest to -- but in all cases, you must evacuate the building immediately!

- 3) Upon hearing the firecall in the warehouse, one person should go into the shipping office and dial 911 and notify the fire department while a second person should go into the office and notify the telephone operator who, in turn, will also call the fire department.

It will be the responsibility of the Shipping Division Supervisor to notify the fire department and the telephone operator in the office.

- 4) If the fire occurs in the warehouse, once again it will be the Shipping Supervisor's responsibility to hold down the "SPCL" button and notify all people and also to notify the fire department, and notify the people in the office.
- 5) After everybody has evacuated, they will meet on the south side (side nearest Gratiot Street) of the Re-Habbers Plumbing Supply building on Papin and Edwin Streets, or as directed by a fire official, for a roll call to make sure that all people are out. It is very important that all people assemble so that everybody is accounted for, and no one has to re-enter the building to look for a missing person.

The incident will be reported to:

The National Response Center Phone: 800/424-8002

This report shall include all information.

Name - Address - Telephone Number.

Material and amount involved.

Injuries and possible hazards to health or environment.



Spill or Rupture

Substance will be absorbed and placed in 55-gallon drums for disposal at an approved hazardous waste disposal plant.

All emergency equipment will be cleaned and kept in full operational status.

Coordination Agreement.

Fire Department.

- 911 (Nature of material has been discussed with Capt. Robinson of Engine House #29, 200 South Vandeventer)

Police Department.

- 911

Ambulance

- 911

Barnes/Sutter Health Center

- 621-4300 (Nature of material has been discussed with Mr. John Hackett, Director)

National Response Center

- 800/424-8002

EPA

- Coordination on Scene

Complete report will be sent to the EPA Regional Administrator and appropriate State and Local Authorities.

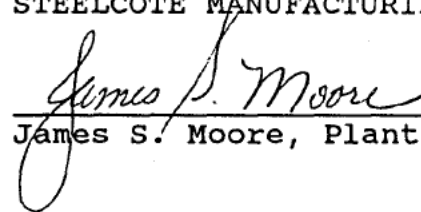
Any revisions resulting from the implementation of this plan must have copies sent to all Holders of Original Plan.

3. SPILL CONFINEMENT

A spill confinement area has been built in the southeast corner of the basement. This area is nine (9) feet by eighteen (18) feet, with front being one concrete block (8 inches high), with a three (3) feet by four (4) feet ramp on each side of the concrete blocks.

Concrete blocks are lined with a solvent resistant coating.

STEELCOTE MANUFACTURING COMPANY

  
James S. Moore, Plant Manager

JSM:llw  
October 18, 1989